

# EXHIBIT 34

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ELLEN GERHART, ELISE	:	
GERHART, ALEX LOTORTO	:	
and ELIZABETH GLUNT,	:	
Plaintiffs	:	CIVIL ACTION NO.
	:	1:17-cv-1726-YK
v.	:	
	:	
ENERGY TRANSFER	:	
PARTNERS, <i>et al.</i> ,	:	
Defendants	:	

**PLAINTIFF’S REQUESTS FOR ADMISSION  
DIRECTED TO DEFENDANT TIGERSWAN**

**INSTRUCTIONS**

If you fail to respond or object to any request within 30 days of the service of the Requests, the matter shall be deemed admitted under Rule 36.

As is more fully set out in Rule 36(a), you must admit or deny each request, and, where necessary, specify the parts of each request to which it objects or cannot in good faith admit or deny. If you object to only part of a Request, you must admit or deny the remainder of the Request. In the event that you object to or deny any Request or portion of a Request, you must state the reasons for its objection or denial.

These Requests shall be deemed continuing and supplemental answers shall be required if you directly or indirectly obtain further information after your initial response.

Each Request solicits all information obtainable by you, including from your attorneys, investigators, agents, employees, and representatives. If you answer a Request on the basis that you lack sufficient information to respond, describe any and all efforts you made to inform yourself of the facts and circumstances necessary to answer or respond.

The terms “you” and “TigerSwan” mean both the business entity known as TigerSwan, a party in this case, and any employee, officer, or director thereof.

### **REQUESTS**

1. Admit that you permitted Nick Johnson to work in your offices in Apex, North Carolina.

ANSWER:

2. Admit that you provided Nick Johnson with a tigerswan.com email address.

ANSWER:

3. Admit that you supplied the funds used by Cedar Forks to pay Nick Johnson, as reflected in the documents bates stamped CEDARFORKS001-29.

ANSWER:

4. Admit that those aforementioned funds paid to Nick Johnson included reimbursement of travel and other business expenses.

ANSWER:

5. Admit that you required Nick Johnson to execute a non-disclosure agreement between himself and you.

ANSWER:

6. Admit that Nick Johnson and Robert Rice posted material on the PA Progress Facebook page with the knowledge of TigerSwan.

ANSWER:

7. Admit that Nick Johnson and Robert Rice posted material on the PA Progress Facebook page in connection with the services they were providing to TigerSwan in 2017.

ANSWER:

8. Admit that, in 2017, Nick Johnson acted as an “agent” – as the term is defined by Pennsylvania law – for TigerSwan, with respect to the Mariner East 2 pipeline.

ANSWER:

9. Admit that, in 2017, Nick Johnson acted as an “agent” – as the term is defined by Pennsylvania law – for TigerSwan, with respect to the PA Progress Facebook page.

ANSWER:

Respectfully submitted,

**WILLIAMS CEDAR**

/s/ CHRISTOPHER MARKOS

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*Attorney for Plaintiffs*

Dated: April 13, 2022

## **CERTIFICATE OF SERVICE**

I, Christopher Markos, certify that on the below date I served the foregoing document on all counsel of record via email.

/s/ CHRISTOPHER MARKOS

Christopher Markos, Esq.

Attorney for Plaintiffs

Dated: April 13, 2022